

Commonwealth of Massachusetts

Department of Telecommunications and Energy

DTE 01-54

Initial Comments of Alternative Power Source, Inc.

July 26, 2001

APS hereby submits comments in the above referenced docket pursuant to the Technical Session held at the Department's offices, July 24, 2001.

APS has had much experience in enrolling and supplying generation services to large commercial clients with multiple branch locations throughout Massachusetts and New England. As such, we have found that the process of developing and implementing the procedures and systems to serve the loads of a large commercial customer with many small and medium sized commercial properties are nearly identical to the process of capturing and serving the mass market. APS has found that the current procedures are cumbersome, costly to administer, require extensive manual intervention and thus a deterrent to competition in the electricity business.

APS has been developing a plan to reach the mass market for both default service and standard offer service customers. The existing procedures have made it very difficult to obtain wholesale supplier pricing upfront. For the clients that have been involved in the acquisition and enrollment process there is a good deal of frustration with the present system. APS has found that a copy of a current bill from the customer is the only sure way to obtain the necessary information required by DISCO's before historical billing information can be obtained, pricing secured, agreements executed and enrollments completed. What is needed is a one-stop electronic authorization and enrollment process.

To help eliminate the impediments to true competition in the electric industry, APS offers the following suggestions.

- ?? Internet Authorization – Allow for electronic signatures for all customer classes.
- ?? Internet authorization by customers for DISCO's to release customer data to any supplier requesting it.
- ?? **DISCO provided customer information to include :**
 - Customer name, address (service and mailing) and phone number
 - Customer billing cycle and rate
 - Customer meter number and type

- Service voltage level: Transmission, high tension, primary, secondary
- Customer account number and code
- Customer consumption history with monthly peak demand data when available
- Customer interval data when available
- Customer load shape type or class when interval data is not available
- Customer payment history (alternatively, exclude customers with bad payment history)

All of the above information should be provided to a supplier/broker once customer electronic authorization has been given to either the supplier / broker and / or the DISCO. The customer should be allowed to provide authorization to either the disco or supplier/broker. Once having given electronic authorization to either entity, the customer should not be expected to have to do it again when changing the supplier and / or soliciting additional bids. If the DISCO receives the authorization, it should be secured in an online file for quick reference. If the supplier / broker receives the authorization, it should be made available to the DISCO(s).

Once a supplier/ broker obtains the authorization all of the above customer information should be made available by DISCOs and the supplier/broker should be allowed to disclose this information to wholesale suppliers under a confidentiality agreement to obtain necessary price quotes. APS' main concern is to expedite competitive markets and the more information that can be provided upfront the better the competitive market will be. APS believes that informed customers will opt in once impediments are removed and the process is streamlined.

Thank you for the opportunity to present the above comments. If the Department has questions for APS or if more information is needed, APS is willing to meet with the Department after the middle of August.